205C .NMR00A089 0001 **MOLYCORP INC QUESTA NM 87556**



\$000214912

WA/NP/SW



3-4-13-1 Transfer#: F412-06-0009

ARR1-626901889

C/F: NMR00A089 VOL 1 MOLYCORP \$00214912

THOUSE Standard

General Reference

Created: 3/1/2013 Temporary Loan of Records

Whole Container: N

FTW-01-03-003-2-050-04-006

Box:4 CC:R6

Other (contact FRC to arrange) BILL OUR UPS ACCOUNT

Asset#: %00097341

To: PATRICIA VINCENT

EPA / DALLAS , 1445 ROSS AVE., SUITE 1200

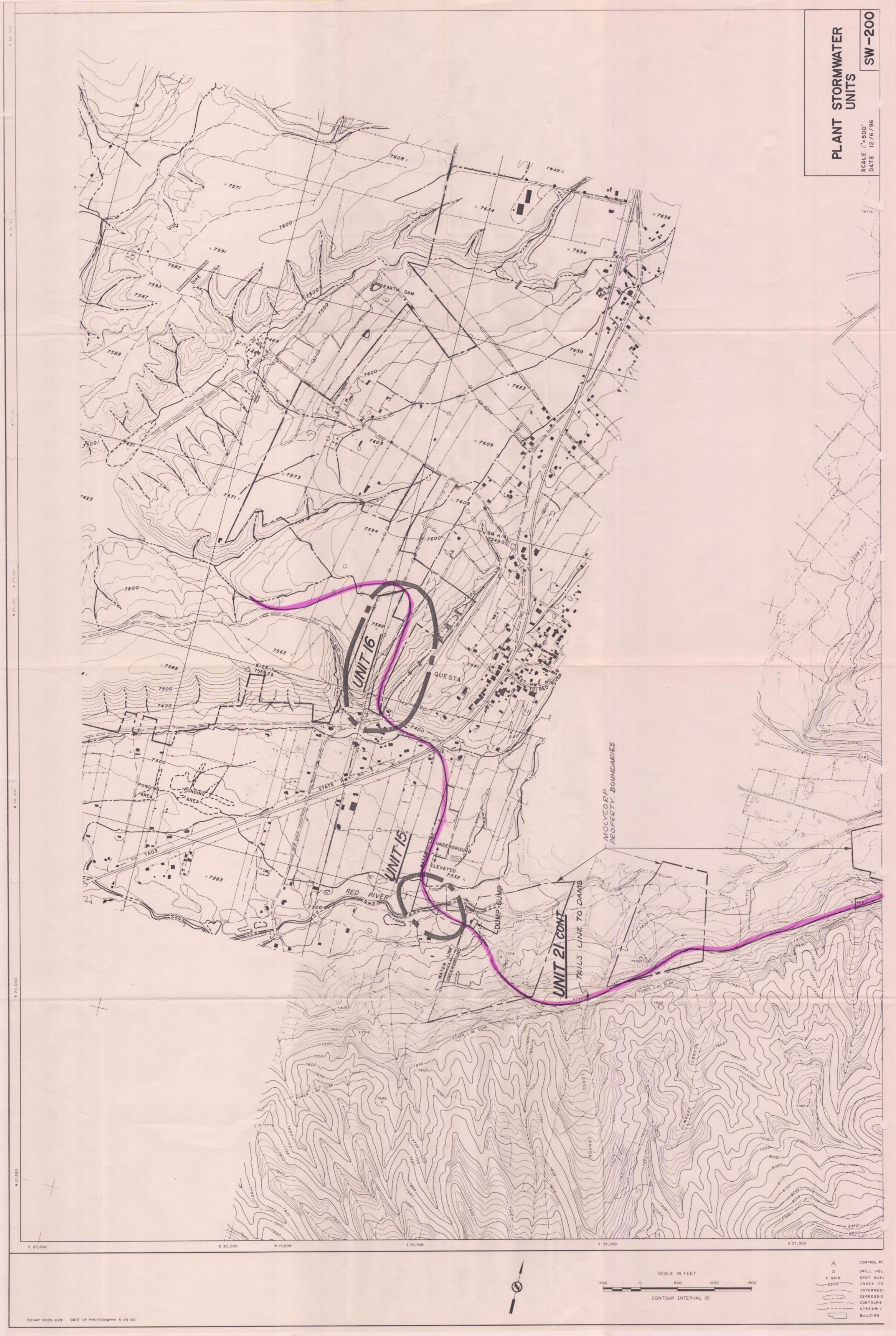
DALLAS, TX, 75202 P: (214) 665-6532

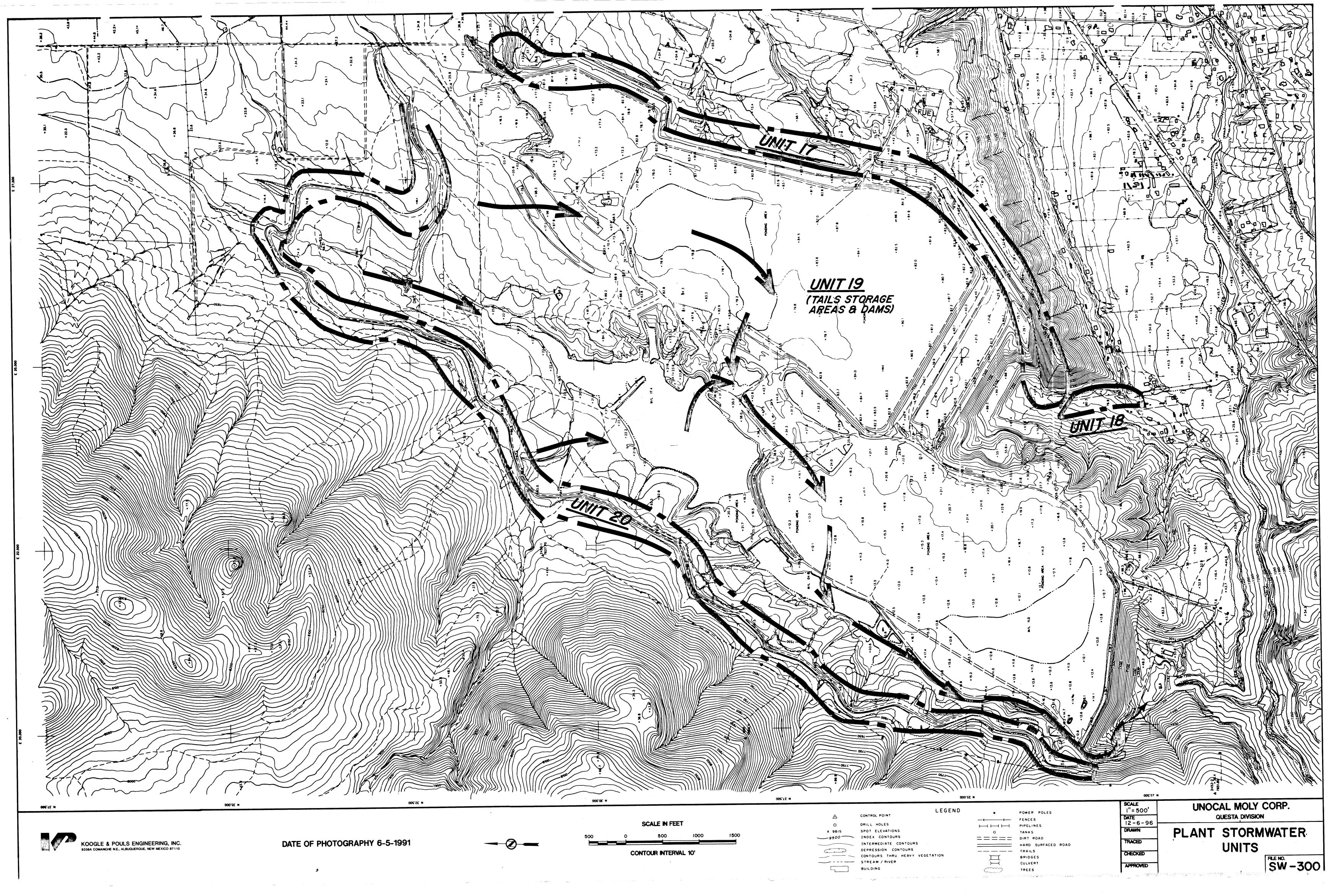
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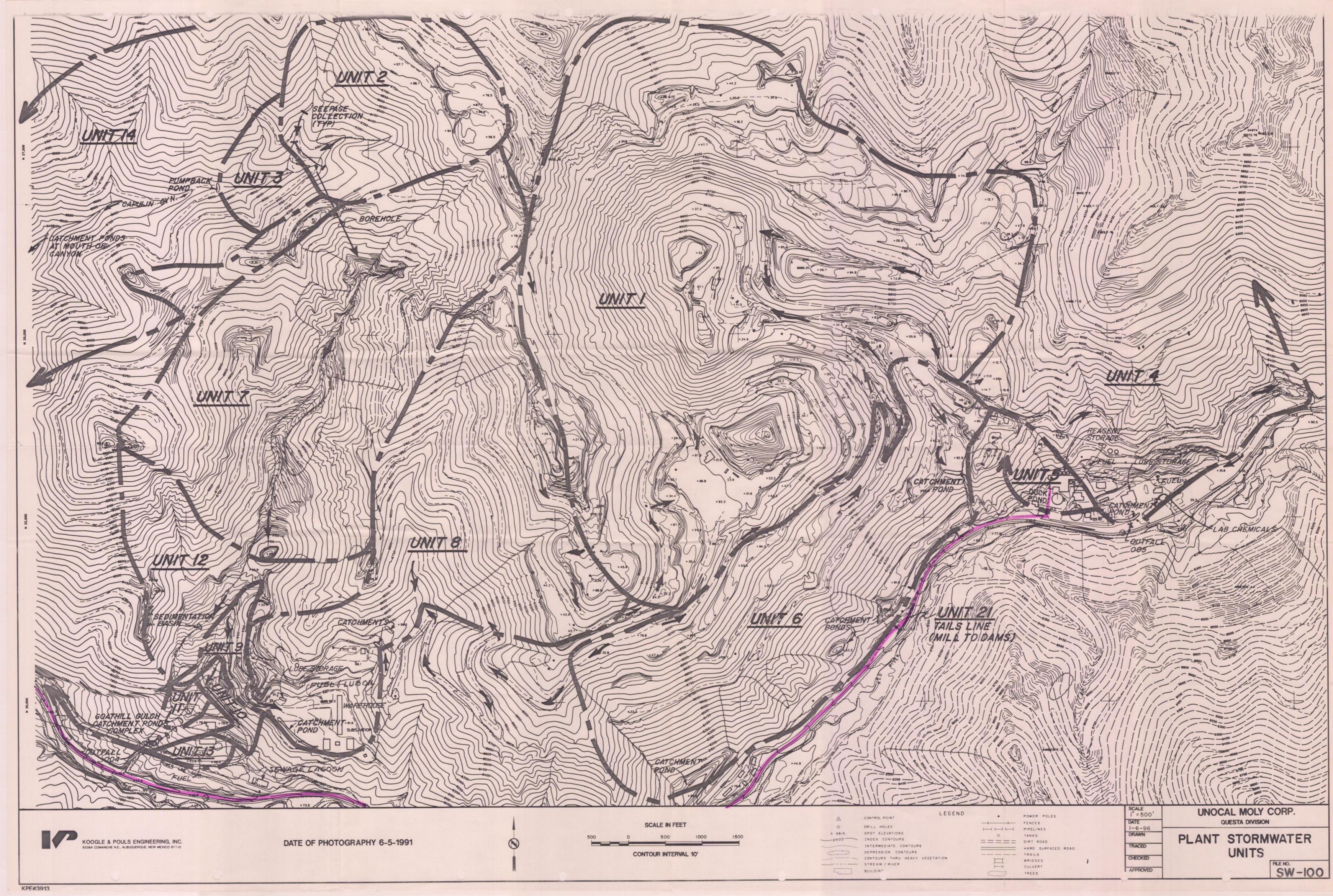
WMD FILE ROOM

() CREATE NEW FILE (, NAME CHA	NGE () ADDRESS CHANGE
() PERMIT NUMBER CHANGE () ADD	VOLUME () DELETE VOLUME
DIVISION: WATER (WA)	
PROGRAM: MPDES (MP)	
TYPE: () GULF OF MEXICO - CG	() GENERAL PERMIT - CP
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() PERMIT - PE	
STORYWETER - SW	RED TAB WHITE TAB
NEW	OLD
PERMIT #: NMROOA 089 VOL #:	
PACILITY NAME: MOLYCORP, IN	<u>C</u>
ADDRESSSTREET: P. O. BOX 469	
CITY: QUESTA,	
grate: VM	21P: 87556
AUTHORIZING OFFICIAL AFAE: MGCY S	mmons DATE: 7-6-98 Kowle
MAIL CODE: 6EN-W	
PHONE #:X6498	-
COMMENTS:	
(CONTRACTOR USE C	•
DATE RCVD:DATE ENTERED:	COMMENTS:
OPERATOR:	

LAI WHD FORM 1 (8/94)







Molycorp, Inc. A Unocal Company Questa Division P.O. Box 469 Questa, New Mexico 87556 Telephone: (505) 586-0212



Certified Mail - Return Receipt Requested

December 16, 1996

Mr. Richard E. Powell
New Mexico Environment Department
Surface Water Quality Bureau
Harold Runnels Building
1190 St. Francis Drive
Santa Fe, NM 87502

RE: Compliance Evaluation Inspection Report, Molycorp, Inc., NPDES Permit #NMR00A089, November 18, 1996

Dear Mr. Powell:

Enclosed please find a copy of Molycorp's revised Stormwater Pollution Prevention Plan (SWPPP), which is to be considered as our response to the referenced inspection report.

In accordance with the findings of your inspection and the resulting report, we have included in the SWPPP a list of individuals acting as members of the pollution prevention team, a description of potential pollutant sources, a description of appropriate measures and controls, and commitment to conduct and document site compliance evaluations on a regular basis. Site compliance evaluations will begin in 1997.

Should you have any questions concerning this response, please do not hesitate to give me

a call at (505) 58677626.

Sincerely,

Gyra 1/ Lam

Geyza I. Lorinczi Environmental Manager

xc: USEPA, Region 6, Stormwater Staff

D. R. Shoemaker M. M. Allain

12/6/96

MOLYCORP, INC. QUESTA MINE STORMWATER POLLUTION PREVENTION PLAN (SWPPP)

INTRODUCTION:

This "Stormwater Pollution Prevention Plan" follows the outline of Federal Register/ Vol. 60, No. 189, 9/29/95 General Provisions Permit.

The goal of this plan is to manage the flow of storm runoff, that could or has come in contact with mine and mill plant process, storage, overburden dump, tailings line and storage, areas including maintenance and access roads; and to control or prevent the pollution of mine property stormwater discharges. The following also outlines procedures for monitoring and observing the mine property stormwater diversion systems, and or sampling of stormwater discharge off the property. Also included is a list of employees who are assigned to implement the plan and to make sure the systems work properly. A list of all chemicals, reagents, fuels and lubricants stored on the property can be found in the Emergency Response Plan. The location of these various materials can also be found on the maps included in this plan.

This document has been kept as simple as possible. It is meant to give general guidance while keeping complicated details to a minimum. It is assumed that personnel monitoring and maintaining the stormwater/snowmelt diversion and routing systems will use common sense and good operating practices in order to achieve the basic goal of keeping the runoff where it belongs.

POLLUTION PREVENTION TEAM:

One or all of the following personnel will or could be required to participate in quarterly inspections or monitoring of the mine, mill and tails areas during runoff events. Table 1 lists the pollution prevention team members who will have to sign off next to their name that they understand the plan and understand how to implement the various phases of the plan as needed. No specific team member will be called if there is a runoff event unless it occurs at night. It will be the responsibility of any or all individuals, who are on the property at the time of the event, to start monitoring the event. Unless the mine manager is present, whoever is first on the scene will take charge. If the event happens at night, security will phone whom ever is available. Security has an up-to-date phone list. Specific responsibilities are not assigned to team members. All team members have to understand any and all of the procedures required to manage storm runoff, monitoring and inspection of the diversion systems since there is no guarantee that all team members will be available for a specific event.

TABLE 1: POLLUTION PREVENTION TEAM SIGNOFF SHEET COVERING INITIAL TRAINING (Renew signature annually)

An employee shall sign off on this sheet after he or she has read, understands the plan, and has surveyed the mine site as shown on maps SR-100, -200, -300

Name	Sign Off
D. Shoemaker	
G. Lorinczi	
P. Prado	
R. Oakely	
F. Martinez	
B. Renison	

DESCRIPTION OF MINING AND MILLING SITES:

The mine property is broken down into 21 main storm and snow melt diversion units. These units are shown on Maps SW-100, -200, -300. A general property map outlines the mine site property boundaries. Table 2 summarizes mine site acreage.

TABLE 2: SUMMARY OF MINE SITE AREAS			
Facility or Unit	Disturbed Acres		
Underground surface subsidence	80		
Open pit	300		
Overburden dumps	750		
Plant site incl. tails lines	310		
Tails disposal area	640		
DISTURBED TOTALS	2080		
Total mine/mill/tails property	6000		

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DESCRIPTION OF MINING AND MILLING SITES Cont.:

Although mining is performed underground, areas of surface activity include the following:

- Mill yard area with warehousing, small vehicle repair and decline shops, fuel and reagent storage, assay lab and associated chemicals, stormwater diversion pond between the changehouse and assay lab, Duck Pond between the No. 1 Transfer Tower and Decline Drive House.
- In active open pit overburden dumps and associated open pit and roads surrounding the open pit excavation, Upper Capulin Canyon seepage collection and pumpback, and lower Capulin Canyon tanks.
- Goat Hill mine site including warehousing, equipment parking, fuel, lube and waste oil storage, storage yards, road cuts, stormwater diversion ponds in lower Goat Hill Gulch and sewage lagoons.
- Tailings line right-of-way between the mill and tailings dams area including the Llargo Canyon watershed that dumps onto the tails line road just east of the lower dump sump, and the upper and lower dump sumps.
- Tailings dams area including dams, IX plant area, tails storage cells, and east and west diversions ditches.

The above are broken down into the following twenty one (21) main storm and snow melt diversion units:

- Unit 1: Open pit overburden dump benches draining to the open pit.
- Unit 2: Upper Capulin Canyon seepage collection points draining to upper Goat Hill Gulch through the horizontal borehole.
- Unit 3: Upper Capulin Canyon seepage collection pond pump-back to borehole.
- Unit 4: Mill drainage from crushers and from area east of concentrator/P&D building to mill yard pond which spills over to Outfall 005.
- Unit 5: West mill yard surface flow to "Duck Pond"
- Unit 6: Runoff from Sulfur/Spring Gulches, Middle, and Sugar Shack South overburden dump faces to highway catchment berms.

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DESCRIPTION OF MINING AND MILLING SITES Cont.:

- Unit 7: Upper and middle Goat Hill Gulch drainage into underground mine subsidence area.
- Unit 8: Drainage from No. 2 and No. 1 shaft yards to No. 1 shaft collection point.
- Unit 9. Drainage downstream of No. 1 shaft yard and off west side of development muck waste pile into Goat Hill catchment ponds complex and on to Outfall 004.
- Unit 10: Runoff downstream of switchback below No. 1 shaft yard and lower storage yard into administration building and sewage lagoons area.
- Unit 11: Drainage above administration building area into ponds complex in lower Goat Hill Gulch to Outfall 004.
- Unit 12: Goat Hill Gulch drainage below subsidence area off west side hydrothermal scar area into lower Goat Hill Gulch ponds complex to Outfall 004.
- Unit 13: Runoff on entrance road below administration building.
- Unit 14: Surface runoff from middle and lower Capulin Canyon into ponds at the mouth of the canyon.
- Unit 15: Lower dump sump area.
- Unit 16: Surface runoff from tails line right-of-way off hill above Embargo Road.
- Unit 17: Surface runoff into and along tailings area East Diversion Ditch which discharges downstream of the east abutment of Dam No. 1.
- Unit 18: Possible discharge from East Diversion Ditch below Dam No. 1 to Embargo Road.
- Unit 19: Surface runoff ponding in tails retention areas after a heavy downpour.
- Unit 20: Tailings area West Diversion Ditch discharging to the Red River via Pope Lake.

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DESCRIPTION OF MINING AND MILLING SITES Cont.:

Unit 21: Tails line right-of-way from the mill to the tails disposal area. Special attention should be given to Red River bank erosion in the Bear Canyon area that could wash out tails lines. Also inspect tails line bridge abutments at Columbine Creek bridge, Thunder bridge, Ranger Station bridge, and lower dump sump crossing. Stormwater runoff out of Llargo Canyon onto the tails line road just east of the lower dump sump has become a problem since the Hondo forest fire in the spring of 1996. This runoff is now being diverted west down the tails line road, to a point several hundred feet upstream of the lower dump sump, where it is diverted off to the north down hill to the Red River (if it gets that far).

DRAINAGE:

When inspecting the above areas one should look for signs of new erosion, contaminants, plugged diversion ditches, sumps and runoff catchments that might be topped or have been topped.

Flow pathways are shown in a general way on the referenced maps, but specific patterns will have to be evaluated in the field.

The quality of the runoff from the mine site and areas not associated with the mine site in general is poor because of the highly altered material the runoff traverses. Because of this, Outfalls 004 and 005, which are part of Molycorp's NPDES permit, should always be monitored and 005 pumped to the mill if it is in danger of leaving the property.

Warehouse items, lube oils, reagents and fuels are all containerized and should not be a problem unless a tank were to be ruptured in a landslide, etc.

PRE-STORM/RUNOFF PREPARATION:

Prior to a runoff event, the following items should be checked:

- a.. Rain gauges located in the mill yard, primary crusher, and at the Goat Hill development muck dump should be clean and empty.
- b. Capulin Canyon pump-back pond should always be kept pumped down.
- c. Seepage collection systems in upper Capulin Canyon should be clean and free of mud, and their inlets to the water lines that convey water to the borehole should be clear and free of trash.

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PRE-STORM/RUNOFF PREPARATION Cont.:

d. All catchment ponds should be clean. This includes 2 berms behind the No. 2 shaft hoist house, 7 berms in Goat Hill Gulch above the entrance/access road to the Goat Hill Administration building (part of Outfall 004), and mill yard which is Outfall 005.

- e. The duck pond and mill yard pond should be pumped down.
- f. Drainage ditches and diversions in the mill yard should be clear and banked for proper diversion including: (1) the runoff ditch on the bank side of the primary crusher access road; (2) and on the bank side of the secondary crusher road coming down from the mill water tanks to the catchment pond located in the upper mil yard; (3) drainage path on the road leading down from the power plant fuel storage tank and associated catchment pond; (4) Duck Pond overflow diversion to the decline portal.
- g. Drainage ditches and diversions in the Goat Hill Plant areas should be clear and banked for proper diversion including: (1) road ditches and diversions coming down from the open pit truck shop to No. 2 shaft yard; 92) and from the no. 2 shaft yard to the No. 1 shaft yard; (3) and from the No. 1 shaft yard to the Administration building and sewage lagoons area.
- h. Open pit roads drainage ditches leading to open pit excavation shall be clear and free to divert waters to the pit.
- i. Open pit overburden dump highway berms should be sound and have any mud flows cleared from behind them.
- j. Fuel and lube oil farms catchment sumps should be cleaned out.
- k. Make sure that upper and lower dump sumps are clean or pumped out.

STORM/RUNOFF EVENT:

The following supplies will be required:

Maps SW-100, -200, -300 and general property map Tape measure 20 - 100 ml. sample bottles Marker pen Shovel Rubber boots Mobile earth moving equipment as required.

STORM/RUNOFF EVENT Cont.:

At the onset of a rainstorm or at the start of a snowmelt period and employee should check and monitor the following:

- A. Make sure that rubber tired front end loaders and motorgraders are available, if they are required.
- B. Depending upon the severity of the storm, call the mill or mine operating personnel, or call out as much help as required to deal with inspection, control and/or sampling of the event.
- C. Make sure that Outfalls 004 and 005 are not overflowing.
- D. Periodically check Outfalls 004 and 005 during the storm event, and if stormwater is overflowing the weirs, measure and sample, using 100ml. sample bottles, both weirs at 20 minute intervals. If an outfall is already flowing over a weir when one gets there, mark the first sample with the time and the fact that it is the first sample. If one has to wait for the water to start flowing over the weir; always mark the first sample as such. Record all sample times. For measurement purposes, there is a piece of rebar set 1' 0" upstream of each weir. The rebar has a flat washer welded to it. The flat side of the washer is level with the crest of the weir (section over which the water flows). Measure from the top flat side of the washer to the water surface and record the measurements. Forms for recording this data are attached at the end of this document. The samples should be taken to the lab and refrigerated as soon as possible during or after the storm event.
- E. Periodically check the fuel/lube oil farms to make sure no oil is being released from the immediate area.
- F. Clean as necessary, diversion ditches and channels that have become blocked with debris.
- G. Clear stormwater runoff channels that have jumped their banks and rebuild the bank so that the runoff is confined to the channel.
- H. If required, turn on the upper Capulin Canyon pump so that the pump-back pond does not overflow.
- I. If required, turn on the mill yard pond pump.
- J. Check and pump the Duck Pond, if it is required.

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STORM/RUNOFF EVENT Cont.:

K. Have someone check all areas from the open pit, mill, Goat Hill, tails lines system to the dams and Pope Lake to see if there are any problems.

The following table gives some discharge values fro the 18" wide standard rectangular weir as a function of head (water depth behind the weir). Forms are also attached for weir measurements.

TABLE: OUTFALLS 004 & 005 DISCHARGE			
HEAD Feet / Inches	Flow, CES / GPM		
0.01' / 0.12"	0.005 CFS / 2.24 GPM		
0.02' / 0.24"	0.014 CFS / 6.28 GPM		
0.03' / 0.36"	0.026 CFS / 11.67 GPM		
0.04' / 0.48"	0.040 CFS / 17.95 GPM		
0.05' / 0.60"	0.055 CFS / 24.68 GPM		
0.06' / 0.72"	0.073 CFS / 32.76 GPM		
0.07' / 0.84"	0.092 CFS / 41.29 GPM		
0.08' / 0.96"	0.112 CFS / 50.27 GPM		
0.09' / 1.08"	0.133 CFS / 59.69 GPM		
0.10' / 1.20"	0.156 CFS / 70.01 GPM		
0.11' / 1.32"	0.179 CFS / 80.34 GPM		
0.12' / 1.44"	0.204 CFS / 91.56 GPM		
0.13' / 1.56"	0.230 CFS / 103.22 GPM		

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MOLYCORP, INC. QUESTA MINE STORMWATER POLLUTION PREVENTION PLAN

OUTFALL 004 MONITORING DATA FORM			DATE:
TIME	HEAD		COMMENTS
		-	
		 	
			
		-	
	-	ļ	
		 	
		<u></u>	
Comment	s on intensity o		
			
			
Problems	·		
	e readings: (aft	er the event)	
Goat I Mill y	Hill dump		
	aru arv crusher		

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MOLYCORP, INC. QUESTA MINE STORMWATER POLLUTION PREVENTION PLAN

OUTFALL 005 MONITORING DATA FORM			DATE:
TIME.	HEAD		COMMENTS
			
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		· · · · · · · · · · · · · · · · · · ·	
<u></u>	<u> </u>	<u> </u>	
Comments of	on intensity of	storm:	
			· · · · · · · · · · · · · · · · · · ·
			······································
Problems: _			
		<u> </u>	
			
Rain gage r	eadings: (afte	r the event)	
Goat Hil	l dump		
Mill yard Primary	d crusher		·

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INSPECTIONS AND/OR MAINTENANCE, REPAIRS OR IMPROVEMENTS:

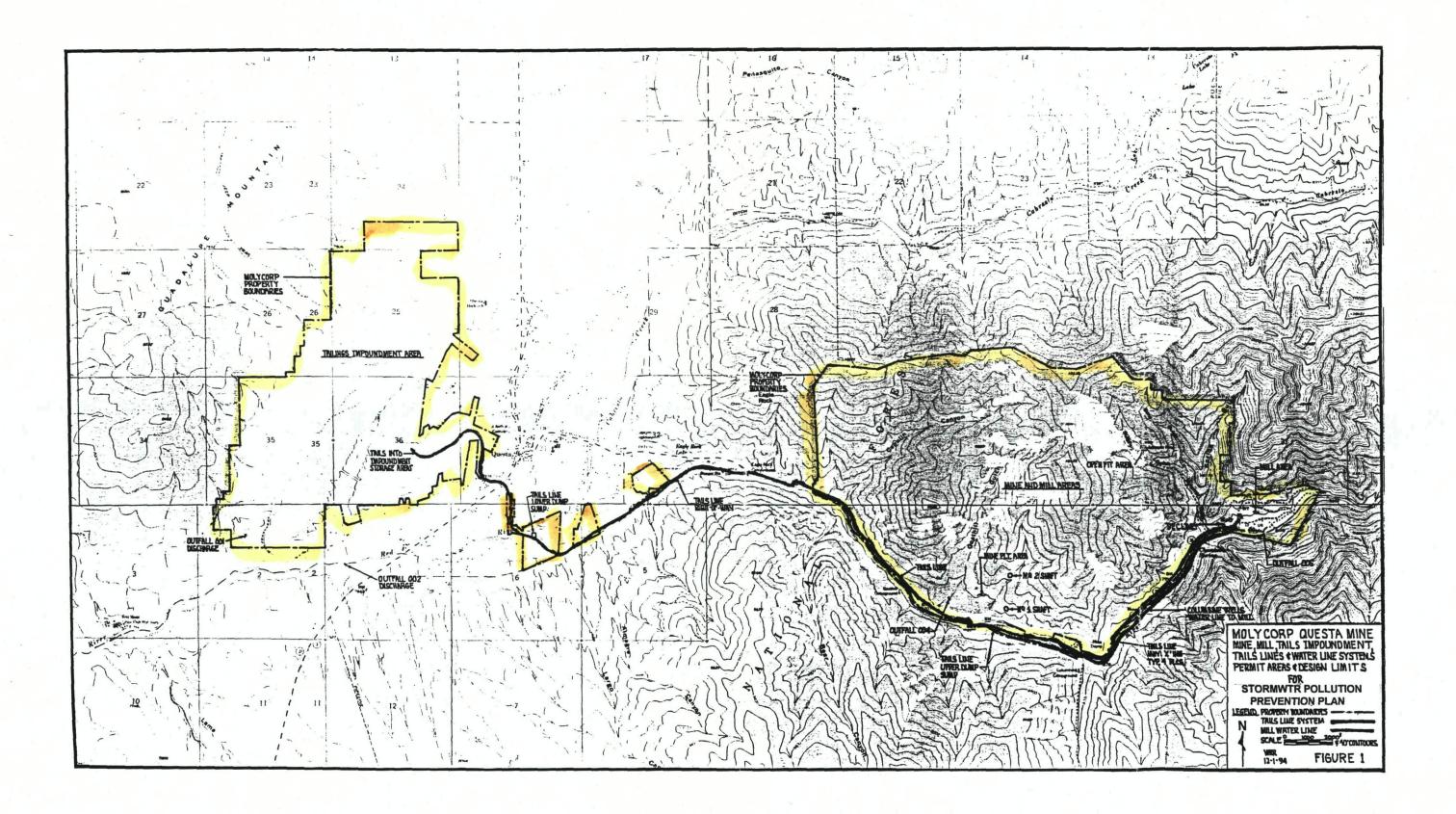
Inspect the storm and snowmelt diversion units as shown on Maps SW-100, -200, -300 at least once a quarter. Sometimes plan an inspection during or after a storm event in order to see how the diversions are functioning. If a unit's controls are in good order or are/have functioned properly, please so indicate in the "remarks" column of Table A. Also indicate any repairs or changes required.

TABL	TABLE A: MOLYCORP STORM DIVERSION INSPECTION, MAINTENANCE, REPAIR OR IMPROVEMENTS FORM (circle which one)				
Unit	Location	Remarks	Inspect Date	Inspector	
1	Open pit				
2	Up. Capulin to borehole				
3	Up. Capulin pmp. back				
4	Crushers				
5	West mill yd.				
6	Hwy dumps				
7	GH to UG				
8	Shafts				
9	Above 004		T		
10	East adm. bldg.				
11	West adm. bldg				
12	Lower GH				
13	Below adm.				
14	Low Capulin				
15	Bear Cyn.				

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INSPECTIONS AND/OR MAINTENANCE, REPAIRS OR IMPROVEMENTS Cont.:

TABL	TABLE A: MOLYCORP STORM DIVERSION INSPECTION FORM Cont.				
Unit	Location	Remarks	Inspect Inspector Date		
16	Corny's corner				
17	E tails dams				
18	E diver. dth.				
19	Ponds/dams				
20	W diver. dth.				
21	Tails lines				
		·			



T. Lonax Taylor



State of New Mexico ENVIRONMENT DEPARTMENT

Harold Runnels Building 1190 St. Francis Drive, P.O. Box 26110 Santa Fe, New Mexico 87502 (505) 827-0187

MARK E. WEIDLER SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

Certified Mail - Return Receipt Requested

November 18, 1996

Mr. Dave Shoemaker Molycorp, Inc. P.O. Box 469 Questa, New Mexico 87556 WOV 221996

RE: Compliance Evaluation Inspection, Unocal/Molycorp, Inc., NPDES Permit #NMROOA089, October 8, 1996

Dear Mr. Shoemaker:

Enclosed, please find a copy of the report for the referenced inspection that I conducted at your facility. This inspection report will be sent to the U.S. Environmental Protection Agency (USEPA) in Dallas, for their review. These inspections are used to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permit issued in accordance with the federal Clean Water Act.

Problems noted during this inspection are discussed in the Further Explanations section of the inspection report. You are encouraged to review the inspection report, correct any problems noted during the inspection, and to modify your operational and/or administrative procedures, as appropriate. Further, you are encouraged to notify in writing, both USEPA and NMED regarding modifications and compliance schedules.

My thanks to Messrs. Remison and Lorinczi of your staff for their help and cooperation during this inspection. If you have any questions, please feel free to contact me at the above address or by telephone at (505) 827-2798.

Sincerely,

Richard E. Powell Surface Water Quality Bureau

xc: USEPA, Dallas (2 copies)
Taylor Sharpe, USEPA (6EN-WT)
NMED, District II, Santa Fe
NMED, Taos Field Office



INITED STATES ENVIRONMENTAL PROTECTION AGENCY Westington, D.C. 20460

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

Section A: National Data System Coding					
Transaction Code					
	Section B: Fa	cility	Data		
Name and Location of Facility Inspected Unocal - Molycorp, Inc. east of Questa on nor	th side NM 38		Entry Time [x AM] PM 9:44 Exit Time/Date 1615 hours 10-8-96	Permit Effective Date 9-9-92 Permit Expiration Date 9-9-97	
Name(s) of On-Site Representative(s)	Title(s)		1013 110013 10-0-30	Phone No(s)	
Geyza Lorinczi*	Environmenta	ıl Mi	anager	1-505-586-7626	
Name. Address of Responsible Official Dave Shoemaker Molycorp, Inc.	Title Manager			Contacted	
P.O.Box 469 Questa, NM 87556	P.O.Box 469				
	ion C: Areas Evalu				
S Permit N Flow Measurem		N N	Pretreatment	Operation and Maintenance	
U Records/Reports N Laboratory	···	N	Compliance Schedule	-	
M Facility Site Review M Effluent/Receive	ng Waters	U	Self-Monitoring Program		
Section D: Summary	of Findings/Comme	ots (Attach additional sheets if necessary)		
 Stormwater Management Operating Plan (SMPPP) revised 7-10-96 Facility has coverage under the NPDES baseline general storm water permit and has prepared a Stormwater Management Operating Plan which permittee uses in lieu of a SMPPP. Permittee's Plan is incomplete in several respects. Permittee has not conducted the required annual site compliance evaluations. 					
Name(s) and Signature(s) of Inspector(s)	Agency/Office/Te			Date	
Richard E. Poweil	NMED/SWQB 505	-827	/-2/98 	11-19-96	
Signature Of Reviewer	Agency/Office			Date	
Regulatory Office Use Only					
Action Taken Date Compliance Status Noncompliance Compliance					

CHECKLIST

Storm Water Industrial General Permit Pollution Prevention Plan

Unocal - Molycorp, Inc.	5ATE 10-8-96	PERMIT NO NMRODAO89
POLLUTION PREVENTION TEAM		
MEETS PERMIT REQUIREMENTS. DETAILS:	SOMO U	N/A (FURTHER EXPLANATION ATTACHED Yes
1. IDENTIFY SPECIFIC INDIVIDUALS.		Y 🖪 N 🗆 N/A 🗀
2. OUTLINE INDIVIDUALS RESPONSIBILITIES.		Y 🗆 N 🛱 N/A 🗀
DESCRIPTION OF POTENTIAL POLLUTANT SOURCES		
MEETS PERMIT REQUIREMENTS. DETAILS:	S M D U	N/A (FURTHER EXPLANATION ATTACHED Yes
1. SITE MAP INDICATING.	···	S O M NO U O N/A C
a) DRAINAGE AREAS	· · · · · · · · · · · · · · · · · · ·	Y 전 N □ N/A □
b) DRAINAGE PATTERNS AND OUTFALLS		Y 전 N □ N/A □
c) STRUCTURAL AND NON-STRUCTURAL CONTROLS just ponds		Y N M N/A D
d) SURFACE WATERS		Y 🍱 N 🗆 N/A 🗀
e) SIGNIFICANT MATERIALS EXPOSED TO PRECIPITATION		Y O N O N/A C
1) LOCATION OF LEAKS/SPILLS WHICH HAVE OCCURED IN THE LAST	3 YEARS	Y D N D N/A T
g) LOCATION OF INDUSTRIAL ACTIVITIES EXPOSED TO PRECIPITATION	ON Not all	Y O N O N/A O
FUELING STATIONS		Y 🗗 N 🗆 N/A 🗆
MAINTENANCE OR CLEANING AREAS need to label mainten	nance	Y DIN ONA O
LOADING/UNLOADING AREAS need to label		Y O N N/A O
WASTE TREATMENT.STORAGE OR DISPOSAL AREAS		Y O N O N/A
LIQUID STORAGE TANKS label		Y 📆 N 🗆 N/A 🗅
PROCESSING AREAS need to label		Y 🗷 N 🗆 N/A 🗆
STORAGE AREAS label		Y□ NŌ N/A□
2. LIST OF POLLUTANTS LIKELY TO BE PRESENT IN DISCHARGES.		S M M U UX N/A I
3. DESCRIPTION OF SIGNIFICANT MATERIALS HANDLED, TREATED, ST THAT EXPOSURE TO STORM WATER OCCURED IN THE LAST 3 YEAR		DOFSUCH S M U U N/A C
a) DESCRIPTION OF THE METHOD AND LCCATION OF STORAGE OR	DISPOSAL	Y 🗆 N 🗆 N/A 🗆
b) DESCRIPTION OF ALL MATERIAL MANAGEMENT PRACTICES		Y 🗆 N 🗆 N/A 🗀
c) DESCRIPTION AND LOCATION OF EXISTING STRUCTURAL AND NO		
4. SUMMARY OF EXISTING STORM WATER SAMPLING DATA have some	old 004, 005 data	S M U U N/A DE
5. DESCRIPTION OF AREAS WITH A HIGH POTENTIAL FOR SIGNIFICAN		S M M U U K N/A
6. A NARRATIVE SUMMARIZING POTENTIAL POLLUTANT SOURCES		S D M D U 🗗 N/A 🗆

Storm Water Industrial General Permit Pollution Prevention Plan

Unocal-Molycorp, Inc.	CATE: 10-8-96	PERMIT NO NIRODAD89	
DESCRIPTION OF APPROPRIATE MEASURES AND CONTROLS		and and the second displayed I did	
MEETS PERMIT REQUIREMENTS. S DETAILS:	омо U 2 N/A о	(FURTHER EXPLA	NATION ATTACHED Yes
1. GOOD HOUSEKEEPING PROCEDURES. for some areas			S [] M & U U N/A []
2. PREVENTIVE MAINTENANCE PROCEDURES. for some areas		- <u> </u>	S M M U U N/A C
3. SPILL PREVENTION AND RESPONSE PROCEDURES.			SATIMI UI N/AC
4. INSPECTION PROCEDURES. very limited - for some area			S M M U Ž N/A C
5. EMPLOYEE TRAINING PROGRAM. none documented			S M U Z N/A C
6. RECORDKEEPING AND INTERNAL REPORTING PROCEDURES			S M M U U M N/A O
7. NON-STORM WATER DISCHARGE CERTIFICATION. not done			S M M U Ž N/A G
a) IDENTIFY AUTHORIZED NON-STORM WATER DISCHARGES AND A	PPROPRIATE CONTI	ROLS	MAIN DN DY
8. EROSION AND SEDIMENT CONTROLS FOR AREAS WITH HIGH EROS	SION POTENTIAL. fo	r some areas	S M M U U N/A U
9. A NARRATIVE CONSIDERATION OF TRADITIONAL STORM WATER MA	ANAGEMENT PRACT	ICES.	S M U M N/A
10. PLANS FOR IMPLEMENTATION AND MAINTENANCE OF TRADITIONA	AL MEASURES APPR	OPRIATE.	S M M U W N/A C
ANNUAL SITE COMPLIANCE EVALUATION REPORTS			
MEETS PERMIT REQUIREMENTS. SO M	U d N/A (FU	RTHER EXPLANA	TION ATTACHED yes
1. SUMMARY OF THE SCOPE OF THE INSPECTION.			S M U U N/A
2. PERSONNEL MAKING THE INSPECTION.			S M U U N/A C
3. MAJOR OBSERVATIONS.			S M M U U N/A D
4. ACTIONS TAKEN TO REVISE THE POLLUTION PREVENTION PLAN.			S M M U U N/A C
5. CERTIFICATION OF COMPLIANCE OR A LIST OF INCIDENTS OF NON-	COMPLIANCE.		S M M U U N/A D
COMPLIANCE WITH MUNICIPAL STORM WATER MANAGEMENT I	REQUIREMENTS		
MEETS PERMIT REQUIREMENTS. SC M DETAILS:	U N/A B (FU	RTHER EXPLANA	TION ATTACHED)
CONSISTENCY OF POLLUTION PREVENTION PLAN WITH OTHER	R PLANS		
MEETS PERMIT REQUIREMENTS. SPCC SÖ M DETAILS:	U U N/A 40 (FU	RTHER EXPLANA	TION ATTACHED;
SALT STORAGE PILES ONSITE COVERED OR ENCLOSED			
MEETS PERMIT REQUIREMENTS. SO NO DETAILS:	1 U U N/A KO (FU	IRTHER EXPLANA	ATION ATTACHED

NPDES Compliance Inspection Unocal/Molycorp, Inc., NMR00A089

Further Explanations

<u>Introduction</u>

On October 8, 1996, a storm water Compliance Evaluation Inspection (CEI) was conducted at the Molycorp, Inc. - molybdenum mine (Standard Industrial Classification 1061) located near Questa, New Mexico by Richard E. Powell of the State of New Mexico Environment Department (NMED). This inspection was conducted coincident with a individual NPDES CEI (#NM0022306) conducted by Ann Young of NMED. The purpose of this inspection was to evaluate the permittee's compliance with the NPDES baseline general storm water permit for industrial activities and storm water regulations at 40 Code of Federal Regulations(CFR) Part 122.26.

Most storm water/mine drainage discharges at this facility are subject to existing effluent limitations guidelines contained in 40 CFR Part 440 and are thus not eligible for coverage under the NPDES baseline general permit. However, discharges of storm water runoff from some areas at this facility are eligible for coverage under that, or other general permits. Mine drainage discharges are covered under the above mentioned individual NPDES permit, which addresses both process water and mine drainage outfalls at this facility. The permittee has prepared a Stormwater Management Operating Plan (SWMOP) which mainly addresses maintenance and operation of the mine drainage and co-mingled mine drainage/storm water containment system in operation at this facility. system is designed to ensure compliance with the requirements of NPDES permit #NM0022306. However, some components of a SWPPP are addressed in the SWMOP, and the SWMOP is used by the permittee to comply with the SWPPP requirements of the general permit, in lieu of an actual SWPPP.

Molycorp, Inc., which mines and processes molybdenum ore, was granted permit coverage under the NPDES baseline general storm water permit and is assigned permit #NMR00A089. Storm water runoff from this site discharges to the Red River; thence to the Rio Grande in Segment 2119 of the Rio Grande Basin. This report is based on review of files maintained by the permittee, on-site observation by NMED personnel, and verbal information provided by the permittee's representatives, Mr. Geyza Lorinczi, Environmental Manager and Mr. Bill Renison, Maintenance Superintendent (who was the official in charge in the absence of Mr. David Shoemaker, Mine Manager).

An entrance interview was conducted with Messrs. Lorinczi and Renison, at approximately 1000 hours on October 8, 1996. The inspector made introductions, presented his credentials and discussed the purpose of the inspection.

Storm Water Pollution Prevention Plan (SWPPP)

Pollution Prevention Team: Overall rating of "Unsatisfactory"

Part IV.D.1 of the permit states, in part, "Each plan shall identify a specific individual or individuals within the facility organization as members of a storm water Pollution Prevention Team that are responsible for developing the storm water pollution prevention plan and assisting the facility or plant manager in its implementation, maintenance, and revision. The plan shall clearly identify the responsibilities of each team member."

The plan does identify individuals who "will or could be required to participate in monitoring the mine and mill areas during a rain storm" but does not identify specific responsibilities of any of the team members.

Description of Potential Pollutant Sources: Overall rating of "Unsatisfactory"

Part IV.D.2 of the permit states, in part, "Each plan shall provide a description of potential sources which may reasonably be expected to add significant amounts of pollutants to storm water discharges or which may result in the discharge of pollutants during any dry weather from separate storm sewers draining the facility. Each plan shall identify all activities and significant materials which may potentially be significant pollutant sources."

The permittee has prepared a site map as required by the general permit but has not indicated structural and non-structural controls for many areas, locations of <u>all</u> industrial activities and materials exposed to precipitation such as some access roads, scrap and parts yards, a fueling and maintenance area, a pipe storage yard, tailings impoundment structures, tailings pipeline corridor, etc. In addition, the permittee has not labeled several facilities on the site map and does not describe all unstabilized areas within the mine site which have a high potential for soil erosion.

Description of Appropriate Measures and Controls: Overall rating of "Unsatisfactory"

Part IV.D.3 of the permit states, In part, "Each facility covered by this permit shall develop a description of storm water management controls appropriate for the facility, and implement such controls. The appropriateness and priorities of controls in a plan shall reflect identified potential sources of pollutants at the facility."

Measures and controls to be described and implemented by the permittee include such things as good housekeeping, preventive maintenance, periodic inspections, employee training, record keeping, non-storm water evaluations and certifications, sediment and erosion control, as well as implementation/maintenance of traditional storm water management practices, where appropriate.

In general, storm water runoff controls for most areas at this facility have been implemented. However, the permittee has not described or implemented storm water management controls for all areas at this site, including some of the above mentioned access roads, storage areas, maintenance area, etc.

In addition, the permittee either does not conduct employee storm water management training or does not record this training, does not conduct periodic inspections or does not record these inspections, their scheduled frequency, personnel conducting the inspection, dates of the inspection, results of the inspection, actions taken to correct problems encountered during the inspection, etc., in the SWPPP. The permittee also has not done the required non-storm water certification and does not discuss implementation/maintenance of traditional storm water management practices.

Annual Site Compliance Evaluation Reports: Overall rating of "Unsatisfactory"

Part IV.D.4 of the permit states, in part, "Qualified personnel shall conduct site compliance evaluations at appropriate intervals specified in the plan, but, except as provided in paragraph IV.D.4.d (below), in no case less than once a year."

According to the permittee's representative, no annual site compliance evaluations have been conducted at this facility.

An exit interview to discuss the findings of this inspection was conducted at approximately 1600 hours on October 8, 1996 with Messrs. Renison, Lorinczi and Fred Martinez, at the mine main office.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



REGION 6 1445 ROSS AVENUE DALLAS, TEXAS 75202-2733

August 20, 1997

Mr. Dave Schoemaker Molycorp., Inc. P.O. Box 469 Questa, NM 87556

Re: NPDES Permit No. NMR00A089

NPDES Storm Water Inspection of October 8, 1996

Dear Mr. Schoemaker:

This letter is a follow up to the October 8, 1996, NPDES storm water inspection of your facility by the New Mexico Environment Department. At the time of the inspection, your facility was found to be in non-compliance with the NPDES permitting program by not having a complete and implemented Storm Water Pollution Prevention Plan (SWPPP).

Part IV of the Baseline Industrial storm permit required your to create an SWPPP by April 1, 1993 and implement the plan. Attached is a list of portions of the SWPPP that the inspection revealed were deficient.

Proper NPDES permitting and implementation of Best Management Practices as set forth in your SWPPP will ensure that storm water runoff does not adversely effect waters of the United States.

Unauthorized discharges in violation of Section 301 of the Act are subject to civil penalties of up to \$27,500 per day per violations. Violations of an NPDES permit are subject to civil violations of up to \$11,000 per day per violation.

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Your permit expires September 9, 1997 and it is appropriate that you transfer permit coverage to the Multi-Sector storm water general permit if you have not already done so.

If you have any questions, please contact me at (214)665-7112 or the EPA storm water hotline at (800)245-6510. The EPA Storm Water web page is: "www.epa.gov/earthlr6/6en/w/sw/home.htm".

Sincerely yours,

Taylor M. Sharpe
Enforcement Officer (6EN-WT)
Compliance Assurance and
Enforcement Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY CUSCS
Weshington, D.C. 20460



NPDES Compliance Inspection Report

Form Approved OMB No. 2040-0003 Approval Expires 7-31-85

Section A: National Data System Coding										
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	Section B: I	acility	Data							
Name and Location of Facility Inspected			Entry Time 9:44	MA 🗽 }	[] PN	1 P	ermit Effecti 9-9-92			
Unocal - Molycorp, Inc. east of Questa on nor	th side NM 38	}	3.44				9-9-92			
see - ceg	;	Exit Time/Date 1615 hours 10-8-96				Po	Permit Expiration Date			
			1615 hours	10-8	-96		9-9-97			
Name(s) of On-Site Representative(s) Title(s)				P	Phone No(s)					
Geyza Lorinczi*	Environment	-a7 M-	n200			1-505-586-7626				
Geyza Lorinczi*	Livitoiment	ai ne	mayer							
Name, Address of Responsible Official Dave Shoemaker	Title Mine Manage	:r	·							
	\$								\dashv	
Molycorp, Inc. P.O.Box 469	· 6 1 b						Contacted			
Questa, NM 87556	505-586-7601	l				ŀ	Yes No			
questa, nn 6/330	1303-360-7601					L_				
Section (S = Satisfactory.)	on C: Arens Evah M = Marginal, U				uated)					
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Facility Site Review M Effluent/Receiving	- Compliance desired			_		orm Water				
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Section D. Summary	or a manage Comm	CHE (7	tuacti eduluoltai	STICELS II I.	ICCC0081 Y	'			\dashv	
1. Stormwater Management Operating Plan (SWP										
2. Facility has coverage under the NPDES bas	-		-	mit and	has p	repared	-Storm	rater	- , }	
Management Operating Plan which permittee		of a	SWPPP.		- 1	<u></u> K	ECEN	/ED		
3. Permittee's Plan is incomplete in several respects.							}			
4. Permittee has not conducted the required annual site compliance evaluations.										
AUG 2 5 1997										
6W-EA										
Name(s) and Signature(s) of Inspector(s)	Agency/Office/To	elephor	16			D	ate			
Richard E. Powell NMED/SMQB 505-827-2798			1.	11-10-96						
77 10 10										
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Signature Of Reviewer	Agency/Office					1)ate			
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	Regulatory Office Use Only									
Action Taken										
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CHECKLIST

Storm Water Industrial General Permit Pollution Prevention Plan

Unocal - Molycorp, Inc.	DATE: 10-8-96	PERMIT NO NMROQAO89			
POLLUTION PREVENTION TEAM					
MEETS PERMIT REQUIREMENTS. DETAILS:	S M U	Ď N/A ☐ (FURTHEP EXPL	ANATION	ATTACH	_{ED} Yes
1. IDENTIFY SPECIFIC INDIVIDUALS.			Y 🗷	N□	N/A 🗆
2. OUTLINE INDIVIDUALS RESPONSIBILITIES.			Υ□	ΝÖ	N/A □
DESCRIPTION OF POTENTIAL POLLUTANT SOURCES					
MEETS PERMIT REQUIREMENTS. DETAILS:	S = M = U	N/A (FURTHER EXPLA	NATION	ATTACHI	_{ED} Yes,
1. SITE MAP INDICATING.		S C	М К О	υŒ	N/A 🗆
a) DRAINAGE AREAS			Y & I	N□	N/A □
b) DRAINAGE PATTERNS AND OUTFALLS			Y ₹ D	ΝП	N/A 🗆
c) STRUCTURAL AND NON-STRUCTURAL CONTROLS just ponds	·····-		Υ□	N 🔼	N/A 🗆
d) SURFACE WATERS			Y 🗷	N□	N/A 🗆
e) SIGNIFICANT MATERIALS EXPOSED TO PRECIPITATION			Υ□	ΝÖ	N/A □
f) LOCATION OF LEAKS/SPILLS WHICH HAVE OCCURED IN THE LAST	3 YEARS		Υ□	N□	N/A ₹
g) LOCATION OF INDUSTRIAL ACTIVITIES EXPOSED TO PRECIPITATION	ON Not all		Υ□	ΝĒ	N/A □
FUELING STATIONS			Y 🗗	Ν□	N/A 🗆
MAINTENANCE OR CLEANING AREAS need to label mainter	nance		YŒ	N□	N/A 🗆
LOADING/UNLOADING AREAS need to label			ΥO	ΝŒ	N/A 🗆
WASTE TREATMENT, STORAGE OR DISPOSAL AREAS			Υ□	N□	N/A ₹
LIQUID STORAGE TANKS label			Y 🖫	Ν□	N/A 🗆
PROCESSING AREAS need to label			ΥŒ	Ν□	N/A □
STORAGE AREAS label			ΥO	ΝŌ	N/A 🗆
2. LIST OF POLLUTANTS LIKELY TO BE PRESENT IN DISCHARGES.		s C	I M 🗆	u 🖎	N/A 🗆
3. DESCRIPTION OF SIGNIFICANT MATERIALS HANDLED, TREATED, ST THAT EXPOSURE TO STORM WATER OCCURED IN THE LAST 3 YEA		D OF SUCH S	J M 🗆	υ□	N/A ₫
a) DESCRIPTION OF THE METHOD AND LOCATION OF STORAGE OR	DISPOSAL		Υ□	N□	N/A 🗆
b) DESCRIPTION OF ALL MATERIAL MANAGEMENT PRACTICES			Υ□	Ν□	N/A □
c) DESCRIPTION AND LOCATION OF EXISTING STRUCTURAL AND NO	ON-STRUCTURAL CO	ONTROLS	Υ□	ΝП	N/A 🗆
4. SUMMARY OF EXISTING STORM WATER SAMPLING DATA have some	e old 004, 005 data	s C) M \square	υ□	N/A (28
5. DESCRIPTION OF AREAS WITH A HIGH POTENTIAL FOR SIGNIFICAN	NT SOIL EROSION	s C] м 🗆	U 🗗	N/A 🗆
6. A NARRATIVE SUMMARIZING POTENTIAL POLLUTANT SOURCES		s C	I M 🗆	υď	N/A 🗆

Storm Water Industrial General Permit Pollution Prevention Plan

Unocal-Molycorp, Inc.	DATE: 10-8-96	PERMIT NO. NMRODAO89		
DESCRIPTION OF APPROPRIATE MEASURES AND CONTROLS				
	- · · - · · • · · · · ·			
MEETS PERMIT REQUIREMENTS. DETAILS:		(FURTHER EXPLA	NATION ATTACHED_Y	<u></u>
1. GOOD HOUSEKEEPING PROCEDURES. for some areas			S M M U N/A	
2. PREVENTIVE MAINTENANCE PROCEDURES. for some areas			S M M U U N/A	
3. SPILL PREVENTION AND RESPONSE PROCEDURES.		SAD MID UD N/A	. 🗆	
4. INSPECTION PROCEDURES. very limited - for some area		S M U U D N/A	. 🗖	
5. EMPLOYEE TRAINING PROGRAM. none documented	S M U W N/A	. 🗆		
6. RECORDKEEPING AND INTERNAL REPORTING PROCEDURES			S M U U S N/A	0
7. NON-STORM WATER DISCHARGE CERTIFICATION. not done			S M U U TO N/A	. 🗆
a) IDENTIFY AUTHORIZED NON-STORM WATER DISCHARGES AND A	PPROPRIATE CONTI	ROLS	Y 🗆 N 🗆 N/A	<u>. 25</u>
8. EROSION AND SEDIMENT CONTROLS FOR AREAS WITH HIGH EROS	SION POTENTIAL. fo	r some areas	S□ MÕ U□ N/A	
9. A NARRATIVE CONSIDERATION OF TRADITIONAL STORM WATER M	ANAGEMENT PRACT	ICES.	S M U W N/A	
10. PLANS FOR IMPLEMENTATION AND MAINTENANCE OF TRADITION	AL MEASURES APPR	OPRIATE.	S M U M N/A	
ANNUAL SITE COMPLIANCE EVALUATION REPORTS				
MEETS PERMIT REQUIREMENTS. SO NO DETAILS: not done	U 🛱 N/A 🗆 (FU	RTHER EXPLANA	ATION ATTACHED Yes	<u>\$</u> _)
1. SUMMARY OF THE SCOPE OF THE INSPECTION.			S M U U U N/A	. 🗆
2. PERSONNEL MAKING THE INSPECTION.			S M U U N/A	
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4. ACTIONS TAKEN TO REVISE THE POLLUTION PREVENTION PLAN.		S M U U N/A		
5, CERTIFICATION OF COMPLIANCE OR A LIST OF INCIDENTS OF NON-COMPLIANCE.			S M U U N/A	
COMPLIANCE WITH MUNICIPAL STORM WATER MANAGEMENT	REQUIREMENTS			
MEETS PERMIT REQUIREMENTS. S. M. DETAILS:	I U U N/A DS (FU	RTHER EXPLANA	ATION ATTACHED	_)
CONSISTENCY OF POLLUTION PREVENTION PLAN WITH OTHE	R PLANS			.
MEETS PERMIT REQUIREMENTS. SPCC SÖ M DETAILS:	ID UD N/A Ø (FU	RTHER EXPLANA	ATION ATTACHED	_
SALT STORAGE PILES ONSITE COVERED OR ENCLOSED	488			
MEETS PERMIT REQUIREMENTS. SI N	I U U N/A RO (FL	IRTHER EXPLAN	ATION ATTACHED_	

NPDES Compliance Inspection Unocal/Molycorp, Inc., NMR00A089

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